



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

**JAN 21 2016**

Mr. Don Wicburg, GM/VP OVM  
Williams Ohio Valley Midstream LLC  
Williams Partners, LP  
2000 Commerce Drive  
Pittsburgh, Pennsylvania 15275

Dear Mr. Wicburg:

The United States Environmental Protection Agency (EPA) hereby requires Williams Ohio Valley Midstream LLC and/or Williams Partners LP and its subsidiaries (collectively "Williams") to provide certain information as part of an EPA investigation to determine the Clean Air Act (CAA or the Act) compliance at the Oak Grove gas processing plant in Marshall County, West Virginia.

Pursuant to Section 114(a) of the CAA, 42 U.S.C. Section 7414(a), the Administrator of EPA is authorized to require any person who owns and/or operates an emission source to establish and maintain records, make reports and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the Act. In order for EPA to determine whether a violation has occurred, you are hereby required, pursuant to Section 114(a) of the CAA, to provide responses to the following questions and requests for information regarding your pigging operations. Therefore, you are hereby required to respond to questions and requests for information in Enclosure 2 within the time period specified. (See Enclosure 1 for instructions and definitions). All information submitted in response to this request must be certified as true, correct, accurate and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Williams. On the last page of your response(s) to this Questionnaire, please include the certification contained in Enclosure 3.

Failure to provide the required information may result in the issuance of an Order requiring compliance with the requirements, or the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. Section 7413(b). In addition, Section 113(c)(2) of the Act provides that any person who knowingly makes any false material statement, representation, or certification in, or omits material information from any document required pursuant to this Act shall upon conviction be punished by a fine pursuant to Title 18 of the United States Code, or by imprisonment for not more than two years, or both. The information you provide may be used by EPA in administrative, civil and criminal proceedings.

You are entitled to assert a business confidentiality claim, covering all or part of the information which this letter requires, except that no such claim can be made with respect to emission data as

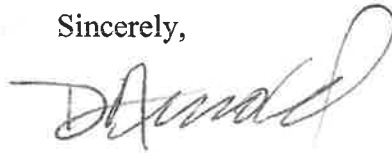
defined at 40 C.F.R. Section 2.301(a)(2) (Enclosure 4). Any such claim should be made in accordance with the procedures described at 40 C.F.R. Section 2.203(b). EPA will provide the public with information subject to a claim of business confidentiality only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. EPA may provide the public with any information not subject to such a claim without further notice. The required submission of information pursuant to Section 114 is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Sections 3501, et seq.

EPA requires Williams to submit the information requested in Enclosure 2 no later than seven (7) calendar days after receipt of this letter. EPA requires that Williams report any changes or revisions to the information supplied within seven (7) days after the change or revision is made. This requirement to provide EPA with changed or revised information shall remain in effect until EPA provides Williams with written notice of its termination. Please submit your response to this request to:

Mr. Bowen (Chip) Hosford  
U.S. Environmental Protection Agency Region III  
Office of Air Enforcement & Compliance Assistance (3AP20)  
1650 Arch Street  
Philadelphia, PA 19103-2029

If you have any questions regarding this information request, please contact Mr. Hosford at (215) 814-3158 or [hosford.chip@epa.gov](mailto:hosford.chip@epa.gov) of the Air Protection Division

Sincerely,

A handwritten signature in dark ink, appearing to read "David L. Arnold", is written over a light blue horizontal line.

David L. Arnold, Acting Director  
Air Protection Division

cc: Robert Keatley, WVDEP

## **ENCLOSURE 1**

### **A. INSTRUCTIONS**

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request.
2. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which it corresponds.
3. Please provide as much information possible to completely answer each question. This includes all supporting documentation, such as performance test reports, inspection records, memorandums, facility records, etc. Failure to completely respond to any questions may increase the time necessary to determine compliance with all applicable regulations.
4. For each document provided in response to these questions, provide an accurate and legible copy, which can be used to determine the completeness of this request. For any information submitted electronically, clearly label to which question(s) the data is responsive.
5. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
6. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

### **B. DEFINITIONS**

1. All terms used in the Information Request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7411 or § 7412 or 40 C.F.R. Part 60.631.
2. "EPA Region III" is defined as the geographic area containing the states of Maryland, Delaware, and West Virginia, the Commonwealths of Virginia and Pennsylvania, and the District of Columbia.
3. "Purge Gas" or "Sweep Gas" means all gas introduced prior to the Flare tip to protect against oxygen buildup in the Flare header and/or to maintain a constant flow of gas through the flare and out the tip.
4. "Supplemental Gas" means all gas introduced to raise the heating value of Waste Gas. "Waste Gas" means all gases routed to a flare for combustion, excluding Purge Gas, Supplemental Gas, Pilot Gas, and steam.
5. "Vent Gas" means all gases found just prior to the flare tip. This gas includes all Waste Gas, Purge Gas, Supplemental Gas, nitrogen and hydrogen, but does not include Pilot Gas or steam.

## **ENCLOSURE 2**

1. Please provide a list of each LDAR component placed on delay of repair between November 2014 and July 2015. Include date, component number, and component type (valve, pump, etc.).
2. In regards to the LDAR database provided by Williams, there are five components classified as "RELIEF." These components are associated with the Stabilizer. Are there any other pressure relief devices being monitored in Williams' LDAR program?
3. Please provide the shutdown date of Debutanizer 1.
4. Please provide the date that LDAR monitoring began in Debutanizer 2.
5. Please provide the following for the facility's Zeeco process flare, emission unit ID FL-1 and emission point 8E in the Permit to Construct:
  - a. Flare manufacturer and model;
  - b. Flare diameter;
  - c. Flare installation date;
  - d. Design destruction efficiency for volatile organic compounds and documentation from the manufacturer that supports the claimed combustion / destruction efficiency
  - e. Flare design and operation specifications (typically from the manufacturer), to include combustion efficiency
  - f. Any other written operation and maintenance procedures, including a Startup, Shutdown and Malfunction Plan, if available.
6. Please provide the following data from the Zeeco flare for July, 2015. Use excel spreadsheets where appropriate:
  - a. Description of gases that were vented to the flare. Identify the processes involved. Include approximate frequency (continuous, intermittent, emergency, unit leaks, etc.) and a block flow diagram.
  - b. List the periods of time (date, start time, and end time) that Waste Gas, Purge Gas, and/or Supplemental Gas was routed to the flare (i.e., "venting periods").
  - c. Calculate the net heating value dilution parameter (NHV<sub>dil</sub>) on a 15 minute block period basis when material is sent to the flare for at least 15 minutes as described in Federal Register Vol. 80, No. 230 dated Tuesday, December 1, 2015, §63.670(n) page 75258-75266 (<https://www.gpo.gov/fdsys/pkg/FR-2015-12-01/pdf/2015-26486.pdf>)
  - d. For each venting period listed in response to section 6b above, provide the net heating value (NHV) in megajoules per standard cubic meter (MJ/scm) or BTU/standard cubic foot (scf), determined by the methods specified in 40 CFR §60.18(f)(3)
  - e. For each venting period listed in response to section 6b above, please provide the average mass flow rate of the Vent Gas, in pounds per hour (lb/hr) that was vented to the flare. The averaging time shall be no more than one hour. If the mass flow rate is not measured, you shall use the best means available to estimate it. Please provide a narrative explanation and example calculations describing how you arrived at your

- response.
- f. For each venting period listed in response to Paragraph b above, please provide the average air-to-Vent Gas ratio (scf of air/lb. of Vent Gas) during any release to the flare. The averaging time shall be no more than one hour. Please provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response.
  - g. Please provide a list of the primary constituents in the Vent Gas routed to the flare for each venting period listed in response to section b above, the range of each constituent's concentration. If continuous measurements are not available, provide an estimate of the range of each constituent's concentration. Please provide any measurements, calculations or test results used to determine the constituent's concentrations.
  - h. Please provide the minimum and maximum air addition rates, in scf/hr for air, at all locations on the flare (seal, upper and lower). To the extent that the air addition rates change on a seasonal basis, state the rates for each season and the time periods during which each season's rates apply.
  - i. Please provide copies of any and all documents in your possession, custody, or control that prescribe or recommend the amount of air to be added to the flare. Please provide a copy of the entire document if, within the document, it states the maximum air rate, minimum air rate, air addition rate associated with a vent scenario, general air-to-organic gas/vent gas rate
  - j. For the flare, state with specificity which, if any, federal and/or state regulations apply.
  - k. Please provide your procedure for controlling air added to the flare, including during process equipment upsets and/or when the flare is smoking. Be sure to address operations that occur at night and other periods of low visibility. Indicate how long this procedure has been in place
  - l. For each venting period listed in response to Paragraph b above, please provide the air flow rate in standard cubic feet per minute (scf/min)
6. Within fifteen (15) calendar days of the receipt of this letter please provide a Sampling Plan for collecting at least one condensate and/or produced water sample(s) each from any pressurized (i.e. above atmospheric pressure) source of liquids discharging into the condensate and produced water storage tanks. If there are other sources of liquids to these tanks, the Sampling Plan shall include procedures for collecting a sample of these liquids as well. This Sampling Plan shall include:
- a. A list of all vessels immediately upstream of each tank that discharge liquids into the storage tanks. Describe each vessel including its function and the process(es) that generate the liquids to the tank(s) including the number of gallons discharged to the tanks. Also, identify which of these vessels operate at higher than atmospheric pressure.
  - b. The proposed sampling location at each vessel that discharges liquids to the storage tanks. The sampling locations shall be mapped and identified in a process flow diagram. Samples collected from pressurized vessels (i.e. those that operated above atmospheric pressure) shall have the same pressure as the pressurized vessel the sample was taken from. If the sample pressure is lower than the pressure in the pressurized vessel when it is taken, the sample shall be considered invalid and taken again. If, when the sample is received at the laboratory, the sample pressure is lower than the pressurized vessel, the sample shall be considered invalid.
  - c. A written sampling protocol for collecting samples from vessels that operate above atmospheric pressure (i.e. pressurized liquid samples) in accordance with Appendix C of

- the API E&P TANK Version 2.0 User's Manual.
- d. Description of analytical method(s) to be used for all samples.
  - e. A schedule for sample collection that is no more than fifteen (15) calendar days after EPA's approval of this Sampling Plan.
  - f. A schedule for submitting the following information to EPA for sampling location(s) identified in the approved Sampling Plan:
    - i. Name of sample location
    - ii. Analytical results in parts per million (ppm) per mole and weight percentage.
    - iii. Date and time of sample collection.
    - iv. Operating temperature (°F) and pressure (psi) of the vessel and the sample bottle at the time the sample was collected
    - v. The pressure (psi) of the sample when it was received by the laboratory.
7. Please provide the following analytical results:
- a. An extended hydrocarbon liquid analysis in accordance with GPA 2286 of any pressurized liquid sample. If such samples and analyses have been done within the past 12 months, you may provide that data in place of a present analysis. Include a copy of the lab analysis report showing:
  - b. Date and time of sample collection.
  - c. Which tank(s) the liquid stream that was sampled would discharge to.
  - d. Description of where the sample was collected.
  - e. Operating temperature (°F) and pressure (psi) of the vessel at the time the sample was collected.
  - f. The pressure (psi) of the sample at the time it was received by the laboratory.
8. Please provide the existing schedule for fugitive leak monitoring from vents, process equipment, etc. at Oak Grove; the results of such monitoring; and any corrective actions taken for discovered fugitive leaks.
9. Please provide analytical results for any produced water sample taken from water removed from the storage tanks.
10. At least 15 calendar days prior to sampling, please provide a sampling protocol and schedule of sampling locations to Bowen (Chip) Hosford at EPA Region 3, at [hosford.chip@epa.gov](mailto:hosford.chip@epa.gov).

**ENCLOSURE 3:**

**STATEMENT OF CERTIFICATION**

[This Certification is for signature by the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or another executive with authority to perform similar policy or decision-making functions of the corporation.]

Williams is submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") request for information, issued pursuant to Section 114(a) of the Clean Air Act, to determine whether the facility is in compliance with the Clean Air Act, including New Source Review Standards.

I certify that I am fully authorized by Williams to provide the above information on its behalf to EPA.

I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, correct, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fines and imprisonment for knowing violations.

Date: \_\_\_\_\_

Name (Printed): \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

## **ENCLOSURE 4:**

### **Confidential Business Information (CBI) Assertion and Substantiation Requirements**

#### **A. Assertion Requirements**

You may assert a business confidentiality claim covering all or part of the information requested in response to this information request, as provided in 40 C.F.R. Section 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to ) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as "trade secret," "proprietary," "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. If you desire confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

#### **B. Substantiation Requirements**

All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, Subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. Sections 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and the disclosure of the information is likely to cause substantial harm to your business's competitive edge.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a confidentiality claim may be disclosed without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible, in accordance with 40 C.F.R. 2.204(e).

1. What specific portions of the information are alleged to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your responses?



3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not to release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. Section 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B.

Emission data means, with reference to any source of emission of any substance into the air:

(A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

(B) Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

(C) A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. Sections 2.301(a)(2)(i)(A), (B), and (C).

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination.

If you fail to claim the information as confidential, it may be made available to the public without further notice to you.